


Begemann and Abe are in the light bulb art and may be combined under § 103, but the disclosure of those patents is insufficient to meet all of Applicant's claim limitations. Further, Watabe and Sugira are not in the light bulb art; they are in the field of semiconductor production. There is no teaching or suggestion in Begemann or Abe to look to the field of semiconductor production to find solutions to problems that engineers in the lighting industry may face. Without first reading the content of Applicant's patent application, one would not know to look deeply into the semiconductor industry to solve by abstraction those lighting problems. As there is no teaching or suggestion established by the Examiner to combine Watabe and Sugira with Begemann and Abe, the Examiner has not established a prima facie case of obviousness of the pending claims. In addition, the various details recited in the claims, such as primary and secondary heat sink, buffer layer, cladding layers, active layer, reflective layers, contact layer, substrate materials, epitaxial layer materials, phosphor coating *on the chip itself*, wells in a heat sink, heat sinks and chips in the wells, and various heat sink materials, as well as other elements and limitations singly and in combination, are not found even if the cited references were to be combined. Therefore Applicant requests withdrawal of Watabe and Sugira as references, withdrawal of the obviousness rejection and allowance of the claims.

Applicant believes that all issues relating to patentability are now resolved and Applicant requests favorable reconsideration of the application. If any fees are due, those fees should be charged to deposit account no. 50-0581.

Respectfully submitted this 9<sup>th</sup> day of October, 2003.



Daniel P. McCarthy  
Reg. No. 36,600  
PARSONS, BEHLE & LATIMER  
201 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
(801) 532-1234